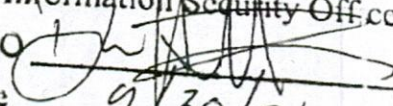


Joshua Adam Schulte, *pro se*

September 30, 2021




BY HAND


Judge Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

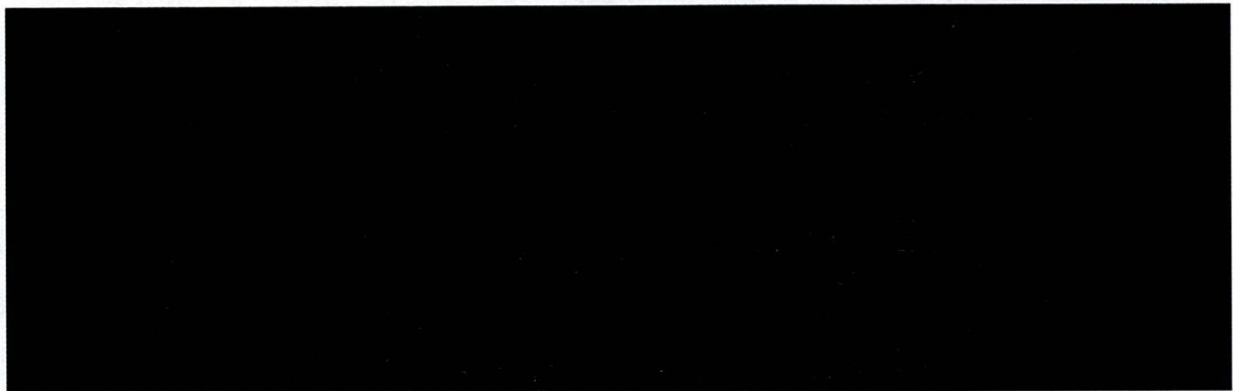
Filed with Classified
Information Security Officer
CISO 
Date 9/30/21

RE: *United States v. Joshua Adam Schulte*, S3 17 Cr. 548 (PAC) REDACTED / CLEARED FOR PUBLIC RELEASE



Dear Judge Crotty:

I write to the court about the pending CIPA 5 motion 
 the outstanding CIA classification analysis of , and the government's
continued abuse and neglect of the federal rules of criminal procedure.

I understand that the CISO has 



Otherwise, if the government maintains that this document is actually somehow classified, it
should immediately produce this CIA analysis to me for review.

I also ask the court to order the CISO and the CIA to respond to my classification analysis
request as brought to the court's attention at the last hearing on September 15, 2021. Standby
counsel reminded the court that the CIA has 14 days to conduct its classification review and
submit its analysis in writing to me. This deadline has long expired—the CISO notified me that



United States v. Schulte, S3 17 Cr. 548 (PAC); September 30, 2021 letter from *pro se* defendant

[REDACTED]

Finally, I wanted to update the court that there are currently three pending motions that the government has yet to respond. Once again, this issue was addressed at the September 15, 2021 conference—the court reminded the government of its obligation under Local Crim. R. 49.1(b), that, “[a]ny opposing papers shall be filed and served within 14 days after service of the motion papers.” The federal rules of criminal procedure, including the local rules, are not suspended when the defendant proceeds *pro se*. Since this court has already reminded the government of its obligation, I now move to preclude the government from responding to the following three motions and ask the court to reprimand and once again remind the government of its obligation under the federal rules of criminal procedure.

The government should be precluded from filing responses to the following motions:

- ***MOTION TO SUPPRESS EVIDENCE FROM WARRANTLESS SEIZURE OF CELL PHONE***, Dkt. 497, filed 8/31/2021
- ***PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 AND MOTION FOR BAIL PURSUANT TO 18 U.S.C. § 3142***, filed 8/31/2021 in classified format pending classification review
- ***CIPA 5 MOTION TO DECLASSIFY CERTAIN WIKILEAKS DOCUMENTS***, Dkt. 502, filed 9/10/2021

Respectfully submitted,

Joshua Adam Schulte